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*Appearances of Counsel Continued on Next Page*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

U.S. SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

CROWD MACHINE, INC., METAVINE, INC,  
and CRAIG DEREL SPROULE,

Defendants,

Case No. 4:22-CV-00076-HSG

Hon. Haywood S. Gilliam, Jr.

**STIPULATION AND JOINT  
STATEMENT TO REQUEST  
MODIFICATION OF SCHEDULING  
ORDER (ECF NO. 48) AND EXTENSION  
OF DEADLINES (WITH ORDER)**

and

METAVINE PTY. LTD.,

Relief Defendant.

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7 Attorneys for Defendants  
CROWD MACHINE, INC. and METAVINE, INC.,  
8 and Relief Defendant METAVINE PTY. LTD.  
  
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1 Plaintiff United States Securities and Exchange Commission (“SEC”), Defendants Crowd  
2 Machine, Inc. and Metavine, Inc., and Relief Defendant Metavine Pty, Ltd. (collectively “Crowd  
3 Machine entities”), hereby jointly submit the following Stipulation and Joint Statement pursuant  
4 to Local Civil Rules 6-1, 6-2, and 7-12, Federal Rule of Civil Procedure 16(b)(4), and paragraph  
5 15 of this Court’s Standing Order, seeking modification of the Court’s September 5, 2023, order  
6 (ECF No. 48) to extend by 7 days the SEC’s deadline to file its reply in support of its motion for  
7 monetary relief, subject to the Court’s approval:

8 1. On March 23, 2022, the Court issued a Scheduling Order, setting this matter for a  
9 May 11, 2023, hearing on the amount of monetary relief owed. The Order also set forth interim  
10 deadlines for the completion of fact discovery, the exchange of expert reports and discovery, and  
11 a briefing schedule for the SEC’s forthcoming motion for monetary relief.

12 2. On September 6, 2022, the Court granted the parties’ joint stipulation to extend  
13 the deadlines set forth in the Scheduling Order by approximately 90 days (ECF No. 31).

14 3. On December 19, 2022, the Court granted the parties’ joint stipulation to extend  
15 the deadlines set forth in the Scheduling Order by approximately 45 days. (ECF No. 36).

16 4. On July 31, 2023, the Court granted the parties’ joint stipulation to extend the  
17 deadlines set forth in the Scheduling Order by 14 days (ECF No. 39).

18 5. On September 5, 2023, the Court Granted the parties’ joint stipulation to extend  
19 the deadlines set forth in the Scheduling Order by 14 days (ECF No. 48).

20 6. As set forth in the following Joint Statement of Good Cause, the parties agree  
21 there is good cause to extend by 7 days the SEC’s deadline to file its reply to in support of its  
22 motion for monetary relief. The parties propose that the hearing on the SEC’s motion for  
23 monetary relief be held as scheduled on November 16, 2023, at 2:00 p.m.

Joint Statement of Good Cause

7. Discovery in this matter has now concluded.

8. The SEC filed its motion for monetary relief on August 18, 2023, and the Crowd Machine entities filed their opposition to the SEC's motion on September 29, 2023.

9. The sole remaining deadline in this matter relates to the SEC's reply in support of its motion for monetary relief, which is currently due on October 13, 2023. A hearing on the SEC's motion for monetary relief is scheduled for November 16, 2023.

10. Before filing its reply in support of its motion for monetary relief, counsel for the SEC must submit its proposed filing for internal review and obtain supervisory approval.

11. Undersigned counsel for the SEC has worked diligently to obtain approval to file its reply in support of its motion for monetary relief, but the approval process remains ongoing and will not be complete before the SEC's filing deadline.

12. The parties therefore agree, subject to the Court's approval, that the SEC's deadline to file its reply in support of its motion for monetary relief be extended by 7 days until October 20, 2023.

13. The parties propose that the hearing on the SEC's motion for monetary relief be held as scheduled on November 16, 2023.

14. The parties agree that this Joint Statement is made in good faith in the interest of judicial economy and is not for the purpose of delay.

Based on the foregoing, IT IS STIPULATED AND AGREED, by and between the parties and their undersigned counsel, that good cause exists for the SEC's deadline to file its reply in support of its motion for monetary relief, as set forth in the Court's order of September 5, 2023 (ECF No. 48), to be MODIFIED as follows:

Event	Current Date (ECF No. 48)	Proposed New Date
Deadline for SEC to file reply in support of motion for monetary relief	Oct. 13, 2023	Oct. 20, 2023
Hearing on SEC's motion for monetary relief	Nov. 16, 2023, at 2:00 p.m.	Nov. 16, 2023, at 2:00 p.m. (No Change)

Dated: October 12, 2023

By: /s/ Adam B. Gottlieb  
 ADAM B. GOTTLIEB  
 Attorney for Plaintiff  
 U.S. SECURITIES AND EXCHANGE  
 COMMISSION

Dated: October 12, 2023

By: /s/ Justin T. Goodwin  
 JUSTIN T. GOODWIN  
 Attorney for Defendants  
 CROWD MACHINE, INC.,  
 METAVINE, INC., and METAVINE PTY. LTD.

### **CIVIL LOCAL RULE 5-1 ATTESTATION**

Pursuant to Northern District of California Local Rule 5-1, I hereby attest that all other signatories listed above, on whose behalf this filing is submitted, concur in the filing's content and have authorized the filing.

/s/ Adam B. Gottlieb  
 Adam B. Gottlieb

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 10/13/2023

  
 HAYWOOD S. GILLIAM, JR.  
 UNITED STATES DISTRICT JUDGE